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Presentment Date: June 13, 2022

Time: 12:00 p.m.

Objections Due: June 10, 2022

Time: 5:00 p.m.

*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN; and AUDREY
GOODMAN, in her capacity as Personal
Representative of the Estate of James M. Goodman,

Defendants.

Adv. Pro. No. 10-04762 (CGM)

NOTICE OF PRESENTMENT OF ORDER IMPLEMENTING JUDGMENT

PLEASE TAKE NOTICE that pursuant to the Memorandum Decision Granting Summary Judgment in Favor of the Trustee in *Picard v. Estate of James M. Goodman, et al.*, Adv. Pro. No. 10-04762 (CGM) (Bankr. S.D.N.Y. June 6, 2022), ECF No. 127, dated June 6, 2022, and in accordance with Local Bankruptcy Rule 9074-1(a), Irving H. Picard, as trustee (the “Trustee”) for the liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the substantively consolidated estate of Bernard L. Madoff, through his undersigned counsel, will present the proposed judgment, attached hereto as **Exhibit A**, to the Honorable Cecelia G. Morris, United States Bankruptcy Judge, for settlement and signature on **June 13, 2022 at 12:00 p.m.**

PLEASE TAKE FURTHER NOTICE that to the extent there is a counter-proposed judgment or objection to the proposed judgment, it must be in writing, and be filed with the Clerk of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004, in by no later than **June 10, 2022 at 5:00 p.m.** (the “Objection Deadline”), with a courtesy copy delivered to the Chambers of the Honorable Cecelia G. Morris and served upon (a) Baker and Hostetler LLP, counsel for the Trustee, 45 Rockefeller Plaza, New York, New York 10111, Attn: David J. Sheehan and Nicholas J. Cremona, and (b) Securities Investor Protection Corporation, 1667 K St. N.W., Suite 1000, Washington D.C. 20006-1620, Attn: Kevin H. Bell. Any objections to the proposed judgment must specifically state the interest that the objecting party has in these proceedings and the specific basis of any objection. Unless a counter-proposed judgment or written objection to the proposed judgment is received before the Objection Deadline, the proposed judgment may be signed and entered by the Court without further notice.

Dated: June 8, 2022
New York, New York

By: /s/ David J. Sheehan
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Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*